

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L. DE
C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY AND IN
HIS CAPACITY AS FOREIGN
REPRESENTATIVE of PERFORADORA ORO
NEGRO, S. DE R.L. DE C.V. AND
INTEGRADORA DE SERVICIOS PETROLEROS
ORO NEGRO, S.A.P.I. DE C.V.

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL PARTNERS,
LLC; AMA CAPITAL PARTNERS, LLC; ANDRES
CONSTANTIN ANTONIUS-GONZÁLEZ; ASIA
RESEARCH AND CAPITAL MANAGEMENT
LTD.; CQS (UK) LLP; FINTECH ADVISORY,
INC.; DEUTSCHE BANK MEXICO, S.A.,
INSTITUCIÓN DE BANCA MÚLTIPLE; GARCÍA
GONZÁLEZ Y BARRADAS ABOGADOS, S.C.;
GHL INVESTMENTS (EUROPE) LTD.; JOHN
FREDRIKSEN; KRISTAN BODDEN; MARITIME
FINANCE COMPANY LTD.; NOEL BLAIR
HUNTER COCHRANE, JR; ORO NEGRO
PRIMUS PTE., LTD.; ORO NEGRO LAURUS
PTE., LTD.; ORO NEGRO FORTIUS PTE., LTD.;
ORO NEGRO DECUS PTE., LTD.; ORO NEGRO
IMPETUS PTE., LTD.; PAUL MATISON LEAND,
JR.; ROGER ALAN BARTLETT; ROGER
ARNOLD HANCOCK; SEADRILL LIMITED;
SHIP FINANCE INTERNATIONAL LTD.; and
DOES 1-100

Defendants.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

Adv. Pro. No. 19-1294(SCC)

**[PROPOSED] ORDER GRANTING THE FOREIGN DEFENDANTS MOTION
TO DISMISS THE COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Upon consideration of the Motion to Dismiss the Complaint for Lack of Personal Jurisdiction (the “Motion”) of Asia Research and Capital Management Ltd., Alp Ercil, CQS (UK) LLP, GHIL Investments (Europe) Ltd., and Ship Finance International, Ltd. (collectively, the “Foreign Defendants”) and all other papers filed by the parties in support of and in opposition to Foreign Defendants’ Motion,

IT IS HEREBY ORDERED that Foreign Defendants’ Motion to Dismiss Plaintiffs’ Complaint in this action is GRANTED.

Dated: _____
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE